

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LIFE STYLE FUTON, INC., and EASY FIT, INC.,

Plaintiffs,

v.

EASYFIT SLIPCOVER, LTD., ILYASS ET TAHIRI,
TUCOWS, INC., TUCOWS.COM CO., and
CABREXA, LLC, and the domain names:

www.easyfitcover.com, www.easyfitslipcover.com,
and www.easyfitslipcover.co, *in Rem*.

Defendants.

Index No.: 1:21-cv-1482

**PLAINTIFFS LIFE STYLE FUTON, INC., and EASY FIT, INC.’S
NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of Application for a Preliminary Injunction; the Declaration of Lillian Nazginov, together with the exhibits attached thereto; and Plaintiff’s Verified Complaint, Plaintiffs Life Style Futon, Inc., and Easy Fit, Inc., by and through their counsel, hereby move the Court for an Order preliminarily enjoining Defendants EasyFit Slipcover LTD., Ilyas Et Tahiri, Cabrexa LLC, Tucows, Inc. and Tucows.com Co. from: using Plaintiff’s Registered Trademark, EASY FIT SLIPCOVER (Reg. No. 2,706,591) or any mark confusingly similar thereto, including “EASY FIT” and “EASYFIT” or variations thereof, on any e-commerce selling portal, advertisement, communication to the public, on furniture coverings and their packaging and/or as a domain name or as part of a domain name, in relation to beddings and furniture coverings; to refrain from retaining, whether directly or indirectly, any third party to use Plaintiffs’ EASY FIT SLIPCOVER trademark for

“Bedding and Furniture Coverings,” including by use of the terms “EASY FIT” and “EASYFIT” or variations thereof on any e-commerce selling portal, advertisement, communication to the public, on furniture coverings and their packaging and/or as a domain name or as part of a domain name, in relation to beddings and furniture coverings; to transfer the infringing web portals – www.easyfitcover.com, www.easyfitslipcover.com, and www.easyfitslipcover.co – to Plaintiffs; and for such further and other relief as the Court deems just and proper.

Dated: New York, New York
February 23, 2021

Respectfully submitted,

OSTROLENK FABER LLP

/s/ Max Moskowitz

Max Moskowitz
Ariel Peikes
845 Third Avenue
New York, New York 10022
Telephone: (212) 596-0500
Facsimile: (212) 382-0888
mmoskowitz@ostrolenk.com
apeikes@ostrolenk.com

Attorneys for Plaintiffs